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20 UBER TECHNOLOGIES, INC., RASIER, LLC,  
21 And RASIER-CA, LLC  
22 [Additional Counsel Listed on Signature Page]

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF DANIEL  
CUMMINGS IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC., RASIER, LLC, RASIER-CA, LLC'S  
UNOPPOSED STATEMENT IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIALS SHOULD BE  
SEALED [ECF NO. 4483]**

This Document Relates to:  
*ALL WAVE 1 BELLWETHER CASES*

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6 – 17th Floor

1 I, Daniel Cummings, declare:

2 1. I am a partner at the law firm of Shook, Hardy & Bacon LLP, attorneys of record for  
3 Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am  
4 a member in good standing of the Bars of the States of Missouri, Kansas, and Nebraska. I know the  
5 following facts to be true of my own knowledge, except those matters stated to be based on information  
6 and belief, and if called to testify, I could competently do so. I offer this Declaration in the above-  
7 captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA,  
8 LLC’s Statement in Support of Plaintiffs’ Administrative Motion to Consider Whether Another  
9 Party’s Materials Should Be Sealed, dated November 25, 2025, ECF 4483 (“Plaintiffs’ Motion” and  
10 “Statement in Support of Sealing”).

11 2. I have reviewed the Stipulation and [Proposed] Order Regarding S-RAD Scores  
12 (“Stipulation”), filed November 25, 2025, ECF 4482 and 4483-3.

13 3. Defendants seek only a single limited redaction to the Stipulation. The redacted  
14 information consists of proprietary, confidential technical information, specifically the average S-  
15 RAD score for a particular region and time period. *See* ECF 4482 at 2, ¶ 2 (“The average S-RAD  
16 score for daytime trips in CityID 26 (covering Phoenix, AZ and Tempe, AZ) over a 7-day period  
17 ending on June 28, 2024 was [REDACTED].”)

18 4. The Stipulation is a stipulation of fact and, on information and belief, the redacted piece  
19 of information has no bearing on the public’s ability to understand the merits of the litigation. Neither  
20 the Stipulation nor the redacted fact are related to a dispositive motion.

21 5. On information and belief, disclosing S-RAD scores would provide competitors  
22 insights and visibility into Uber’s trade secrets, which even on a limited basis could allow competitors  
23 to begin to reverse engineer this highly confidential technology that Uber has not revealed publicly  
24 and has gone to great lengths to safeguard, causing competitive harm to Uber.

25 6. There is no public interest in the disclosure of the average S-RAD score for daytime  
26 trips in a portion of Arizona over a 7-day period ending on June 28, 2024. On information and belief,  
27 this minor detail adds nothing to the public’s understanding of the merits of this litigation.

1           7.       There are no less restrictive alternatives to sealing the unredacted Stipulation—  
2 Defendants seek only a single, narrowly tailored redaction.

3  
4           I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct.

6  
7 Executed on December 2, 2025.

By: /s/ Daniel Cummings  
Daniel Cummings